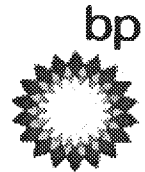


Certified Mail # 7017 2680 0000 8845 9557



March 26, 2019

Alaska Department of Environmental Conservation
Air Permits Program
610 University Avenue
Fairbanks, Alaska 99709-3643
ATTN: Compliance Technician

BP Exploration (Alaska) Inc.
900 East Benson Boulevard
P.O. Box 198612
Anchorage, Alaska 99519-6612
(907) 561-5111

ADEC AIR QUALITY

ORIGINAL

APR 01 2019

FAIRBANKS

2018 BPXA Annual Compliance Certifications

Enclosed are the 2018 Annual Compliance Certifications for the Greater Prudhoe Bay (GPB) facilities shown in the table below.

Facility Name	Permit
Central Compressor Plant (CCP)	Air Quality Permit 166TVP01
Central Gas Facility (CGF)	Air Quality Permit 270TVP01, Rev. 4 Air Quality Permit 270CPT04
Flow Station 2 (FS-2)	Air Quality Permit 268TVP01, Rev. 2 Air Quality Permit 268MSS02, Rev. 1
Flow Station 3 (FS-3)	Air Quality Permit 269TVP01 Air Quality Permit 269MSS01
Gathering Center 1 (GC-1)	Air Quality Permit 182TVP01, Rev. 3 Air Quality Permit 182MSS02, Rev. 1
Gathering Center 2 (GC-2)	Air Quality Permit 183TVP01, Rev. 3 Air Quality Permit 183MSS03, Rev. 1
Gathering Center 3 (GC-3)	Air Quality Permit 184TVP01, Rev. 3 Air Quality Permit 184MSS02, Rev. 2

The certifications cover the reporting period for each facility from January 1, 2018 to December 31, 2018. The certifications are submitted consistent with 40 CFR 71.6(c)(1), specific permit conditions, and include a certification statement signed by the appropriate responsible official for each of the above facilities.

If you have any question concerning a certification, please call me at 564-4405.

Sincerely,

Rachel Buckbee
Compliance Advisor, Air Quality

Attachments: 1 original w/ 2 copies

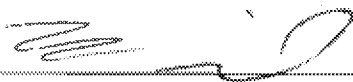
cc: Office of Air Quality- EPA Region 10, Seattle
James Plosay- ADEC Juneau

2018 Annual Compliance Certification
Gathering Center 2
Reporting Period: January 1, 2018 to December 31, 2018

CERTIFICATION OF TRUTH, ACCURACY, AND COMPLETENESS

"Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete."

Responsible Official:




Kollin Fencil
Area Operations Manager
BP Exploration (Alaska) Inc.

3/26/19

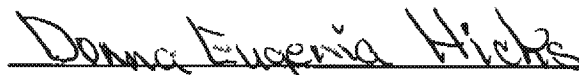
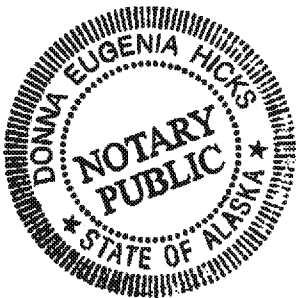
Date

Notarization

The foregoing certification was acknowledged before me on the 26 day of March 2019, by Kollin Fencil, who is personally known to me.



Notary Public



Printed, Typed, or Stamped Name

Commission Number: 151113001

My Commission Expires: November 13, 2019

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
Section 4. Emission Fees			
1	Assessable Emissions. The Permittee shall pay to the Department an annual emission fee based on the facility's assessable emissions as determined by the Department under 18 AAC 50.410. The assessable emission fee rate is set out in 18 AAC 50.410(b). The Department will assess fees per ton of each air contaminant that the facility emits or has the potential to emit in quantities greater than 10 tons per year. The quantity for which fees will be assessed is the lesser of	Continuous	Accounting Records Review
1.1	the facility's assessable potential to emit of 3,193 TPY; or	Not Applicable	Replaced by AQ0183MSS03 Rev 1, Condition 2.1
1.2	the facility's projected annual rate of emissions that will occur from July 1 to the following June 30, based upon actual annual emissions emitted during the most recent calendar year or another 12 month period approved in writing by the Department, when demonstrated by a. an enforceable test method described in 18 AAC 50.220; b. material balance calculations; c. emission factors from EPA's publication AP-42, Vol. I, adopted by reference in 18 AAC 50.035; or d. other methods and calculations approved by the Department.	Continuous	Accounting Records Review
2	Assessable Emission Estimates. Emission fees will be assessed as follows: 2.1 no later than March 31 of each year, the Permittee may submit an estimate of the facility's assessable emissions to ADEC, Air Permits Program, ATTN: Assessable Emissions Estimate, 410 Willoughby Ave., Juneau, AK 99801-1795; the submittal must include all of the assumptions and calculations used to estimate the assessable emissions in sufficient detail so the Department can verify the estimates; or 2.2 If no estimate is received on or before March 31 of each year, emission fees for the next fiscal year will be based on the potential to emit set forth in condition 1.1	Continuous	HSE Document Review
Section 5. Source-Specific Requirements			
3, 3a, 3b	Visible Emissions. The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 4, 2, and 12 through 24 and 27 through 32, listed in Table 1 to reduce visibility through the exhaust effluent by any of the following: a. more than 20% for more than three minutes in any one hour; b. more than 20% averaged over any six consecutive minutes	Not Applicable	Replaced by AQ0183MSS03 Rev 1, Condition 4
3c, 3d	The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 3 through 8 listed in Table 1 to reduce visibility through the exhaust effluent by any of the following: c. more than 20% for more than three minutes in any one hour; d. more than 20% averaged over any six consecutive minutes.	Not Applicable	Replaced by AQ0183MSS03 Rev 1, Condition 4
3e	The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 3 through 8 listed in Table 1 to reduce visibility through the exhaust effluent by any of the following: e. more than 10% averaged over any six consecutive minutes.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
3f, 3g	The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 9, 10, and 11 listed in Table 1 to reduce visibility through the exhaust effluent by any of the following: f. more than 20% for more than three minutes in any one hour; g. more than 20% averaged over any six consecutive minutes.	Not Applicable	Replaced by AQ0183MSS03 Rev 1, Condition 4
3h	The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from Source ID(s) 9, 10, and 11 listed in Table 1 to reduce visibility through the exhaust effluent by any of the following: h. more than 5% averaged over any six consecutive minutes.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
3.1, 3.2	3.1 For Source ID(s) 4 through 8, 16, and 17, 1-2, 4 through 17, 27 through 32, and 36 burn only gas as fuel. Monitoring for these sources shall consist of an annual certification that each of these sources fired only gas. Report under condition 63 if any fuel is burned other than gas. 3.2 For Source ID(s) 9 through 15, when operated only on gas, monitoring shall consist of an annual certification that the sources fired only gas. If any of Source ID(s) 9 through 15 operate on liquid fuel for more than 400 hours in any consecutive 12-month period monitor, record, and report according to conditions 23.1b through 25, for that source. Otherwise, monitoring shall consist of an annual certification of compliance with the opacity standard in condition 3.	Continuous	HSE Document Review Field Operating/Maintenance Records Review

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
3.3, 3.4	3.3 For each of Source ID(s) 18 through 24, and 37 as long as they do not exceed 400 hours of total (emergency and non-emergency hours combined) operation per consecutive 12-month period, monitoring shall consist of an annual certification of compliance with the opacity standard. Otherwise, monitor, record, and report visible emissions in accordance with Section 6. 3.4 For Source ID(s) 27 through 32 (flares), monitor, record and report in accordance with condition 31.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
4	Particulate Matter. The Permittee shall not cause or allow particulate matter emitted from Source ID(s) 1 through 24 and 27 through 32 listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.	Not Applicable	Replaced by AQ0183MSS03 Rev 1, Condition 5
4.1, 4.2	4.1 For Source ID(s) 1 through 18, and 17 , 1-2, 4 through 17 burn only gas as fuel. Monitoring for these sources shall consist of an annual certification that each of these sources fired only gas. Report under condition 63 if any fuel is burned other than gas. 4.2 For Source ID(s) 9 through 15, when operated only on gas, monitoring shall consist of an annual certification that the sources fired only gas. If any of Source ID(s) 9 through 15 operate on liquid fuel for more than 400 hours in any consecutive 12-month period monitor, record, and report according to conditions 26 through 27 for that source. Otherwise, monitoring shall consist of an annual certification of compliance with the particulate matter standard in condition 4.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
4.3, 4.4	4.3 For each of Source ID(s) 18 through 24, as long as they do not exceed 400 hours of total (emergency and non-emergency hours combined) operation per consecutive 12-month period, monitoring shall consist of an annual certification of compliance with the particulate matter standard. Otherwise, monitor, record, and report in accordance with conditions 28 through 30. 4.4 For Source ID(s) 27 through 32 (flares) the Permittee must annually certify compliance with the particulate matter standard.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
5	Sulfur Compound Emissions. In accordance with 18 AAC 50.055(c), the Permittee shall not cause or allow sulfur compound emissions, expressed as sulfur dioxide (SO₂), from 1 through 24 and 27 through 32 to exceed 500 parts per million (ppm) averaged over three hours.	Not Applicable	Replaced by AQ0183MSS03 Rev 1, Condition 6
5.1	For Source ID(s) 1 through 17 and 27 through 32 1-2, 4-17, and 27-32 using fuel gas: a. Monitoring conducted as required by condition 22.1 satisfies the monitoring requirements necessary to assure compliance with this condition. b. Keep records of analyses conducted in accordance with condition 22.2. c. Report as excess emissions, in accordance with condition 63, whenever the fuel combusted causes sulfur compound emissions to exceed the standard of condition 5. d. Include copies of the records required by condition 5.1b, for each month covered by the report, with the facility operating report required by condition 65.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
5.2	For Source ID(s) 9 through 15 and 18 through 24, using liquid fuel from a North Slope topping plant, the Permittee shall obtain from the topping plant the results of a monthly fuel sulfur analysis. a. The Permittee shall include in the facility operating report required by condition 65 a list of the sulfur content measured for each month covered by the report. b. If the fuel contains greater than 0.75% sulfur by weight, the Permittee shall calculate SO ₂ emissions in PPM using either the SO ₂ material balance calculation in Section 15, or Method 19 of 40 C.F.R. 60, Appendix A-7, adopted by reference in 18 AAC 50.040(a). c. If SO ₂ emissions are calculated under condition 5.2b to exceed 500 ppm, the Permittee shall report under condition 63. The report shall document the calculation under condition 5.2b. d. For fuel with a sulfur content greater than 0.75% by weight, the Permittee shall include in the facility operating report required by condition 65 the calculated SO ₂ emissions in PPM.	Continuous	HSE Document Review Field Operating/Maintenance Records Review

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
6, 6.1, 6.2, 6.3, 6.4	<p>The Permittee shall limit actual emissions from the turbines, Source ID(s) 1 through 8, as indicated in Table 2 below.</p> <p>6.1 The Permittee shall calculate the monthly and the twelve-month consecutive summation of emissions of NO_x and CO for Source ID(s) 1 through 8, of PM for Source ID(s) 3 through 8, of VOC for Source ID(s) 1 and 2, and of SO₂ for Source ID(s) 3 and 5. Use the emission factors found in Section 16 of this permit, along with the hours of operation and/or amount of fuel used, to calculate the monthly emissions for each unit.</p> <p>6.2 Report the monthly and the consecutive twelve-month period summation of emissions for each month of the reporting period, with each facility operating report required by condition 65.</p> <p>6.3 Notify the Department per condition 63 should the twelve-month consecutive summation of emissions of any air contaminant exceed the limit for that contaminant in Table 2.</p> <p>6.4 Monitor, record, and report in accordance with condition 21 to demonstrate compliance with the short-term BACT NO_x emission limit in Table 2.</p>	Continuous	<p>Table 2 from MSS03, Rev 1 replaces TVP Table 2 for EU ID 5.</p> <p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p> <p>Operating Practices Review</p>
6.5	Operate Source IDs 1 and 2 with lean head end (LHE) combustors to control NO _x emissions.	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p> <p>Operating Practices Review</p>
7	<p>The Permittee shall limit actual emissions from the heaters, Source ID(s) 9, 10, and 11 as indicated in Table 3 below.</p> <p>7.1 The Permittee shall calculate the monthly and the twelve-month consecutive summation of emissions of NO_x, CO and PM for Source ID(s) 9, 10, and 11. Use the emission factors found in Table 5 of Section 16 of this permit, along with the hours of operation and/or amount of fuel used, to calculate the monthly emissions for each unit.</p> <p>7.2 Report the monthly and the consecutive twelve-month period summation of emissions, for each month of the reporting period, with each facility operating report required by condition 65.</p> <p>7.3 Notify the Department per condition 63 should the twelve-month consecutive summation of emissions of any air contaminant exceed the limit for that contaminant in Table 3.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
8	<p>The Permittee shall operate the emergency equipment, Source ID(s) 18 through 24, for no more than 200 hours each per consecutive 12-month period.</p> <p>8.1 Monitor and record the monthly and the consecutive 12-month period summation of operational hours for each of Source ID(s) 18 through 24.</p> <p>8.2 Report the monthly and the consecutive 12-month period total hours operated each month of the reporting period from condition 8.1 with the facility operating report required by condition 65.</p> <p>8.3 Report under condition 63 if the consecutive 12-month period total hours of operation for any given month exceed the limit for Source ID(s) 18 through 24.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
9	<p>The Permittee shall monitor, record and report the hours of operation as follows.</p> <p>9.1 Monitor and record the monthly operating times for each of Source ID(s) 1 through 24.</p> <p>9.2 For each of Source IDs 9 through 15, monitor and record the monthly operating time separately for fuel gas and liquid fuel firing and record the consecutive 12-month total liquid fuel operating time.</p> <p>9.3 Report using the facility operating report under condition 65, the data recorded under conditions 9.1 and 9.2.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
10, 10.1	<p>The Permittee shall monitor the monthly fuel consumption for Source IDs 1 through 24 and 27 through 32 as source category totals. For Source IDs 1 through 5, the Permittee shall maintain and operate a monitoring device (e.g., fuel gas meter) to measure the total volume of fuel gas consumed by Source IDs 1 through 5, combined. For Source IDs 6 through 8, the Permittee shall either maintain and operate a monitoring device to measure the total volume of fuel gas consumed or estimate the total volume of fuel consumed by other means. For Source IDs 9 through 24 and 27 through 32 (heaters, liquid-fired equipment, and flares), the total volume of fuel consumed by each source group may be estimated.</p> <p>10.1 Record the monthly fuel consumption for each fuel-fired source group shown in Table 1 (Groups I through IV).</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
10.2	Submit copies of the records required by condition 10.1 with the facility operating report required by condition 65. Report the total quantity and type of fuel burned in each source group (Groups I through IV of Table 1), and the total quantity of fuel burned at the facility, MMsct per month for fuel gas-fired sources and gallons per month for liquid fuel-fired sources.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
11	The Permittee shall not use fuel gas, in Source ID(s) 1, 2, 3, and 5, with a hydrogen sulfide (H₂S) concentration that exceeds 25 ppmw at standard conditions, annual average. Upon completion of Department approved air quality modeling, this limit will be increased to 75 ppmw. 11.1 Monitor and record according to conditions 22.1 and 22.2. 11.2 Report the consecutive twelve month period average fuel gas H ₂ S concentration for each month of the reporting period, with each facility operating report required by condition 65. 11.3 Notify the Department per condition 63 should the twelve month period average fuel gas H ₂ S concentration exceed the limit in condition 11.	Not Applicable	Replaced by AQ0183MSS03, Rev 1 Conditions 7.2a and 7.2b.
12	NSPS Subpart A Startup, Shutdown, & Malfunction Requirements. The Permittee shall maintain records for Source ID(s) 1 through 8, 24, and 33 through 35 in accordance with 40 CFR 60.7(b).	Continuous	HSE Document Review Field Operating/Maintenance Records Review
13	NSPS Subpart A Excess Emissions and Monitoring Systems Performance Report. For Source ID(s) 1 through 8, and 24 the Permittee shall comply with 40 CFR 60.7(c) and (d).	Continuous	HSE Document Review Field Operating/Maintenance Records Review
14	NSPS Subpart A Performance (Source) Tests. At such times as may be required by the NSPS Administrator, the Permittee shall conduct source tests for Source ID(s) 1, 2, 3, and 5 according to Section 10 of this permit and 40 CFR 60.8 and shall provide the Department and EPA with a written report of the results of the source test.	Continuous	HSE Document Review No source tests were conducted or required to be conducted during the certification period.
15	NSPS Subpart A Good Air Pollution Control Practice. The Permittee shall, maintain and operate Source ID(s) 1 through 8, 24, and 33 through 35 in accordance with 40 CFR 60.11(d).	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
16	NSPS Subpart A Credible Evidence. The credible evidence rule of 40 CFR 60.11(g) applies to Source ID(s) 1 through 8, 24, and 33 through 35.	Continuous	Advisory Provision
17	NSPS Subpart A Concealment of Emissions. The Permittee shall not conceal emissions from Source ID(s) 1 through 8, 24, and 33 through 35 as provided in 40 CFR 60.12. Monitoring shall consist of an annual certification that the Permittee does not conceal emissions.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
18	NSPS Subpart Ka VOC Standard. The Permittee shall maintain and operate Source ID 33 with a vapor recovery system meeting the specifications of 40 CFR 60.112a(a)(3) and in accordance with the Operations and Maintenance Plan developed in compliance with 40 CFR 60.113a(a)(2)(iii).	Continuous	Operating Practices Review
19	NSPS Subpart Kb VOC Standard. The Permittee shall maintain and operate Source IDs 34 and 35 with a closed vent system and control device meeting the specifications of 40 CFR 60.112b(a)(3) 19.1 Operate the closed vent system and monitor closed vent system parameters in accordance with the operating plan submitted to the Administrator. 19.2 Maintain records in accordance with 40 CFR 60.115b(c)(1) & (2), and §60.116b(a) & (b).	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
20	<p>NSPS Subpart GG NO_x Standard. The Permittee shall not allow the corrected exhaust gas concentration of NO_x from Source ID(s) 1, 2, 3, and 5 to exceed the standard found in 40 C.F.R. 60.332(a)(2). Based on the provisions of this standard, the corrected exhaust gas NO_x concentration standards for Source IDs 1, 2, 3, and 5 are as follows:</p> <p>a. Source ID(s) 1 and 2 shall not exceed 176 ppmvd at 15% O₂, ISO;</p> <p>b. Source ID 3 shall not exceed 198 ppmvd at 15% O₂, ISO; and</p> <p>c. Source ID 5 shall not exceed 169 ppmvd at 15% O₂, ISO.</p>	Continuous	HSE Document Review
21, 21.1	<p>NO_x Monitoring, Recordkeeping, and Reporting for NSPS Subpart GG Turbines.</p> <p>21.1 Waivers. The Permittee shall provide to the Department a written copy of any U.S. EPA granted waiver of the federal emission standards, recordkeeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules upon request by the Department. The Permittee shall keep a copy of each U.S. EPA issued monitoring waiver or custom monitoring schedule on file.</p>	Continuous	HSE Document Review
21.2, 21.2a(i)	<p>Periodic Testing.</p> <p>a. Initial Periodic Testing. For each turbine subject to conditions 8 and/or 20 that operates for 400 hours or more in any 12-month period during the life of this permit, the Permittee shall satisfy either condition 21.2a(i) or 21.2a(ii).</p> <p>(i) For existing turbines not represented by emission data described in condition 21.2a(ii), the Permittee shall conduct a NO_x and O₂ source test under 40 C.F.R. 60, Appendix A-7, Method 20 or following another protocol approved by the Department within three years after issuance of this permit</p> <p>(A) for each turbine, or</p> <p>(B) on one turbine to represent a group of turbines, if allowed to do so under condition 21.3.</p>	Continuous	HSE Document Review
21.2a(ii)	<p>If a test following 40 C.F.R. 60, Appendix A-7, Method 20 or following another protocol approved by the Department has been conducted on a turbine within two years before the issuance date of this permit, and the test shows that emissions at maximum load are less than 90 percent of the applicable emission limit(s) in conditions 8 and/or 20, then</p> <p>(A) the Permittee may use those test results to represent emissions from that turbine or for a group of turbines if allowed under condition 21.3 until the testing of condition 21.2a(i)(B) is performed; and</p> <p>(B) the Permittee shall conduct a Method 20 test or a test following any other protocol approved by the Department on each turbine, or on one of a group of turbines as allowed under condition 21.3, within the 5 years of the permit term.</p>	Continuous	HSE Document Review
21.2b	<p>Higher Tier Testing. For each turbine with test results under condition 21.2a that are 90 percent or more of the applicable emission limit(s) of conditions 8 and/or 20, or for which emissions will equal or exceed 90% of the emission limit at maximum load, as shown through condition 21.4, the Permittee shall conduct an additional Method 20 test or a test following another protocol approved by the Department for the turbine within one year of the test under condition 21.2a. The Permittee shall conduct at least one additional test per year until at least two consecutive tests show that emissions for the turbine are less than 90 percent of the limit at loads up to maximum load.</p>	Continuous	HSE Document Review
21.3a	<p>Substituting Test Data. The Permittee may use a test under conditions 21.2a or 21.2b performed on only one of a group of turbines to satisfy the requirements of those conditions for the other turbines in the group if</p> <p>a. the Permittee demonstrates that test results are less than 90% of the applicable emission limit(s) of conditions 8 and/or 20, and are projected under condition 21.4 to be less than 90% of the limit at maximum load;</p>	Continuous	HSE Document Review

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
21.3b	<p>b. for any source test done after the issuance date of this permit, the Permittee identifies in a source test plan under condition 55</p> <ul style="list-style-type: none"> (i) the turbine to be tested; (ii) the other turbines in the group that are to be represented by the test; and (iii) why the turbine to be tested is representative, including that each turbine in the group <ul style="list-style-type: none"> (A) is located at a facility operated and maintained by the Permittee; (B) is the same make and model and has identical fuel nozzles and combustor; and (C) uses the same fuel type. <p>c. for any source test done before the issuance date of this permit and used under condition 21.2a(i), the Permittee</p> <ul style="list-style-type: none"> (i) demonstrates why the test results are representative of emissions from the entire group of turbines, including that each turbine in the group <ul style="list-style-type: none"> (A) is located at a facility operated and maintained by the Permittee; (B) is the same make and model and has identical fuel nozzles and combustor; and (C) uses the same fuel type. (ii) submits all results of source testing that has been performed on each turbine in the group, regardless of the date of the test, and certifies that the submittal is complete, consistent with 18 AAC 50.205. 	Continuous	HSE Document Review
21.4, 21.4a, 21.4b	<p style="text-align: center;">Load.</p> <p>a. The Permittee shall conduct all tests under condition 21.2 in accordance with 40 C.F.R. 60.335(c)(3), except as otherwise approved in writing by the Department, or by EPA if the circumstances at the time of the EPA approval are still valid. For the highest load condition, if it is not possible to operate the turbine during the test at maximum load, the Permittee will test the turbine when operating at the highest load achievable by the turbine under the ambient and facility operating conditions in effect at the time of the test.</p> <p>b. The Permittee shall demonstrate in the source test plan for any test performed after the issue date of this permit whether the test is scheduled when maximum NO_x emissions are expected.</p>	Continuous	HSE Document Review
21.4c	<p>If the highest operating rate tested is less than the maximum load of the tested turbine or another turbine represented by the test data,</p> <ul style="list-style-type: none"> (i) for each such turbine the Permittee shall provide to the Department as an attachment to the source test report <ul style="list-style-type: none"> (A) additional test information from the manufacturer or from previous testing of units in the group of turbines; if using previous testing of the group of turbines, the information must include all available test data for the turbines in the group, and (B) a demonstration based on the additional test information that projects the test results from condition 21.2 to predict the highest load at which emissions will comply with the applicable limit(s) in conditions 6 and/or 20. (ii) the Permittee shall not operate any turbine represented by the test data at loads for which the Permittee's demonstration predicts that emissions will exceed the applicable limit(s) of conditions 6 and/or 20; (iii) the Permittee shall comply with a written finding prepared by the Department that <ul style="list-style-type: none"> (A) the information is inadequate for the Department to reasonably conclude that compliance is assured at any load greater than the test load, and that the Permittee must not exceed the test load; (B) the highest load at which the information is adequate for the Department to reasonably conclude that compliance assured is less than maximum load, and the Permittee must not exceed the highest load at which compliance is predicted, or (C) the Permittee must retest during a period of greater expected demand on the turbine. (iv) the Permittee may revise a load limit by submitting results of a more recent approved test done at a higher load, and, if necessary, the accompanying information and demonstration described in condition 21.4c(i); the new limit is subject to any new Department finding under condition 21.4c(iii) and 	Continuous	HSE Document Review
21.4d, 21.4e	<p>d. In order to perform an emission test, the Permittee may operate a turbine at a higher load than that prescribed by condition 21.4c.</p> <p>e. For the purposes of conditions 21.1 through 21.6, maximum load means the hourly average load that is the smallest of</p> <ul style="list-style-type: none"> (i) 100 percent of manufacturer's design capacity of the gas turbine at ISO standard day conditions; (ii) the highest load allowed by an enforceable condition that applies to the turbine; or (iii) the highest load possible considering permanent physical restraints on the turbine or the equipment which it powers. 	Continuous	HSE Document Review

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21.5	<p style="text-align: center;">Recordkeeping.</p> <p>a. The Permittee shall comply with the following for each turbine for which a demonstration under condition 21.4c does not show compliance with the applicable limit(s) of conditions 6 and/or 20 at maximum load.</p> <p style="padding-left: 40px;">(i) The Permittee shall keep records of</p> <p style="padding-left: 80px;">(A) load; or</p> <p style="padding-left: 40px;">(B) as approved by the Department, surrogate measurements for load and the method for calculating load from those measurements.</p> <p style="padding-left: 40px;">(ii) Records in condition 21.5a shall be hourly or otherwise as approved by the Department.</p> <p style="padding-left: 40px;">(iii) Within one month after submitting a demonstration under condition 21.4c(i)(B) that predicts that the highest load at which emissions will comply is less than maximum load, or within one month of a Department finding under condition 21.4c(iii), whichever is earlier, the Permittee shall propose to the Department how they will measure load or load surrogates, and shall propose and comply with a schedule for installing any necessary equipment and beginning monitoring. The Permittee shall comply with any subsequent Department direction on the load monitoring methods, equipment, or schedule.</p> <p>b. For any turbine subject to conditions 6 and/or 20, that will operate less than 400 hours in any 12 consecutive months, keep monthly records of the hours of operation. If a turbine that normally operates less than 400 hours exceeds that total during any 12-month period.</p> <p style="padding-left: 40px;">(i) test according to condition 21.2; or</p> <p style="padding-left: 40px;">(ii) if it is no longer possible to meet that schedule, test within one year of exceeding 400 hours in 12 consecutive months.</p>	Continuous	HSE Document Review
21.6, 21.6a	<p style="text-align: center;">Reporting.</p> <p>a. In each facility operating report under condition 65, the Permittee shall list for each turbine tested or represented by testing at less than maximum load and for which the Permittee must limit load under condition 21.4c</p> <p style="padding-left: 40px;">(i) the load limit;</p> <p style="padding-left: 40px;">(ii) the turbine identification; and</p> <p style="padding-left: 40px;">(iii) the highest load recorded under condition 21.5a during the period covered by the facility operating report.</p>	Continuous	HSE Document Review
21.6b	<p>In each facility operating report under condition 65 for each turbine for which condition 21.2 has not been satisfied because the turbine normally operates less than 400 hours in any 12 months, the Permittee shall identify</p> <p style="padding-left: 40px;">(i) the turbine;</p> <p style="padding-left: 40px;">(ii) the highest number of operating hours for any 12 months ending during the period covered by the report; and</p> <p style="padding-left: 40px;">(iii) any turbine that operated for 400 or more hours.</p>	Continuous	HSE Document Review
21.6c	<p>The Permittee shall report under condition 63 if</p> <p style="padding-left: 40px;">(i) a test result exceeds the emission standard;</p> <p style="padding-left: 40px;">(ii) testing is required under condition 21.2 or 21.5b but not performed, or</p> <p style="padding-left: 40px;">(iii) the turbine was operated at a load exceeding that allowed by conditions 21.4c(ii) and 21.4c(iii); exceeding a load limit is deemed a single violation rather than a multiple violation of both monitoring and the underlying emission limit.</p>	Continuous	HSE Document Review
22	<p>NSPS Subpart GG Sulfur Standard. The Permittee shall not allow the sulfur content of the fuel burned in Source ID(s) 1 through 8, and 24 to exceed 0.8 percent by weight.</p>	Continuous	HSE Document Review
22.1	<p style="text-align: center;">22.1 Monitoring</p> <p>a. For gaseous fuels (Source ID(s) 1 through 8), determine compliance at least monthly with the fuel sulfur content standard in this condition as follows:</p> <p style="padding-left: 40px;">(i) Determine the sulfur content of the fuel gas using ASTM D 4810-88, ASTM D 4913-89, Gas Producer's Association (GPA) method 2377-86, or an alternative analytical method approved by the Administrator.</p> <p>b. For liquid fuels (Source ID 24), determine compliance with the fuel sulfur content standard in this condition as follows:</p> <p style="padding-left: 40px;">(i) Determine the liquid fuel sulfur content on each occasion that fuel is transferred to the bulk storage tank from any other source or in accordance with an EPA-approved custom fuel-monitoring schedule.</p> <p style="padding-left: 40px;">(ii) Determine the sulfur content of the liquid fuel using ASTM D 2880-71 or an EPA-approved method.</p> <p>c. The fuel sulfur analyses required under this condition may be performed by the owner or operator, a service contractor retained by the owner or operator, the fuel vendor, or any other qualified agency.</p>	Continuous	HSE Document Review

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22.2	Recordkeeping - Keep records of analyses conducted as required by condition 22.1a and 22.1b.	Continuous	HSE Document Review
22.3, 22.3a, 22.3b	Reporting a. The Permittee shall semi-annually report to the EPA results of all sulfur monitoring required by this condition. b. For the purpose of EEMSP reports and summary report required under condition 13, report any period during which the sulfur content of the fuel being fired in the turbine exceeds 0.8 percent sulfur by weight as excess emissions.	Continuous	HSE Document Review
22.3c	c. Include copies of the records required by condition 22.2 with the facility operating report required by condition 85.	Continuous	HSE Document Review
Section 6. Visible Emissions and PM Monitoring, Recordkeeping and Reporting			
23, 23.1, 23.1a	Visible Emissions Monitoring. The Permittee shall observe the exhaust of Source ID(s) 9 through 15 and 18 through 24 for visible emissions using the Method 9 Plan under condition 23.1. 23.1 Method 9 Plan. For all 18-minute observations in this plan, observe exhaust, following 40 C.F.R. 60, Appendix A-4, Method 9, adopted by reference in 18 AAC 50.040(a), for 18 minutes to obtain 72 consecutive 15-second opacity observations. a. <u>First Method 9 Observation.</u> For Source ID(s) 18 through 24, observe exhaust for 18 minutes within six months of the effective date of this permit.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
23.1b, 23.1c, 23.1d	b. <u>Second Method 9 Observation.</u> Observe exhaust while firing on liquid fuel per condition 23.1 within 30 days after the end of a calendar month in which the cumulative hours of operation on liquid fuel for the past 12 consecutive months exceed 400 hours, except when an 18-minute Method 9 observation has already been conducted in accordance with condition 23.1 in the same 12 consecutive month period and the source appears to not have excess visible emissions while in operation on liquid fuel. c. <u>Third Method 9 Observation.</u> Observe exhaust while firing on liquid fuel per condition 23.1 within 30 days after the end of a calendar month in which the cumulative hours of operation on liquid fuel for the past 12 consecutive month period exceed 800 hours. d. <u>Increased Method 9 Frequency.</u> If a six-minute average opacity is observed during the most recent set of observations to be greater than 15 percent and one or more observations are greater than 20 percent, then increase or maintain the 18-minute observation frequency for that source to at least monthly intervals, until a six-minute average opacity observed during the most recent set of observations is not greater than 15 percent or no more than one observation is greater than 20 percent.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
24	Visible Emissions Recordkeeping. The Permittee shall keep records in accordance with this condition. 24.1 When conducting the Method 9 observations of condition 23.1 a. the observer shall record (i) the name of the facility, emissions source and location, facility type, observer's name and affiliation, and the date on the Visible Emissions Field Data Sheet in Section 14; (ii) the time, estimated distance to the emissions location, approximate wind direction, estimated wind speed, description of the sky condition (presence and color of clouds), plume background, and operating rate (load or fuel consumption rate) on the sheet at the time opacity observations are initiated and completed; (iii) the presence or absence of an attached or detached plume and the approximate distance from the emissions outlet to the point in the plume at which the observations are made; (iv) opacity observations to the nearest five percent at 15-second intervals on the Visible Emissions Observation Record in Section 14, and (v) the minimum number of observations required by the permit; each momentary observation recorded shall be deemed to represent the average opacity of emissions for a 15-second period; b. to determine the six-minute average opacity, divide the observations recorded on the record sheet into sets of 24 consecutive observations; sets need not be consecutive in time and in no case shall two sets overlap; for each set of 24 observations, calculate the average by summing the opacity of the 24 observations and dividing this sum by 24; record the average opacity on the sheet; c. calculate and record the highest 18-consecutive-minute average observed.	Continuous	HSE Document Review Field Operating/Maintenance Records Review

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25, 25.1	Visible Emissions Reporting. The Permittee shall report visible emissions as follows: 25.1 include in each facility operating report under condition 65 a. copies of the observation results (i.e. opacity observations), except for the observations the Permittee has already supplied to the Department; b. a summary to include: (i) number of days observations were made; (ii) highest six-minute average observed; and (iii) dates when one or more observed six-minute averages were greater than 20 percent; c. a summary of any monitoring or recordkeeping required under conditions 23 and 24 that was not done.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
25.2	Report under condition 63: a. the results of Method 9 observations that exceed an average 20 percent for any six-minute period; and b. if any monitoring under condition 23 was not performed when required.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
26, 26.1a	Particulate Matter Monitoring for Liquid Fuel-Fired Heaters. The Permittee shall conduct source tests on liquid fuel fired sources, Source ID(s) 9 through 15, to determine the concentration of particulate matter (PM) in the exhaust of a source in accordance with the following: 26.1 Except as provided in condition 26.4, within six months of exceeding the criteria of condition 26.2, either: a. conduct a PM source test according to requirements set out in Section 10; or	Continuous	HSE Document Review
26.1b	make repairs so that emissions no longer exceed the criteria of condition 26.2 to show that emissions are below those criteria, observe emissions as described in condition 23.1 under load conditions comparable to those when the criteria were exceeded.	Continuous	HSE Document Review
26.2, 26.3, 26.4	26.2 Conduct the test according to condition 26.1 if 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent. 26.3 During each one hour PM source test run, observe the exhaust for 18 minutes in accordance with Method 9 and calculate the average opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report. 26.4 The automatic PM source test requirement in conditions 26.1 and 26.2 is waived for an emissions unit if a PM source test on that unit has shown compliance with the PM standard during this permit term.	Continuous	HSE Document Review
27, 27.1	Particulate Matter Reporting for Liquid Fuel-Fired Heaters. The Permittee shall report as follows: 27.1 report under condition 63 a. the results of any PM source test that exceed the PM emissions limit; or b. if the threshold of condition 26.2 was exceeded and the Permittee did not comply with either condition 26.1a or 26.1b.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
27.2	In each facility operating report under condition 65, include a. the dates, Source ID(s), and results when an observed 18-minute average was greater than the threshold in condition 26.2; b. a summary of the results of any PM testing under condition 26; and c. copies of any visible emissions observation results (opacity observations) greater than the threshold of condition 26.2, if they were not already submitted.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
28, 28.1a	Particulate Matter Monitoring for Liquid Fuel-Fired Engines. The Permittee shall conduct source tests on diesel engines, Source ID(s) 18 through 24, to determine the concentration of particulate matter (PM) in the exhaust of a source in accordance with the following: 28.1 Except as provided in condition 28.4, within six months of exceeding the criteria of condition 28.2a or 28.2b, either a. conduct a PM source test according to requirements set out in Section 10; or	Continuous	HSE Document Review
28.1b	make repairs so that emissions no longer exceed the criteria of condition 28.2; to show that emissions are below those criteria, observe emissions as described in condition 23.1 under load conditions comparable to those when the criteria were exceeded.	Continuous	HSE Document Review

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28.2, 28.3, 28.4	<p>28.2 Conduct the test according to condition 28.1 if</p> <p>a. 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity greater than 20 percent; or</p> <p>b. for a source with an exhaust stack diameter that is less than 18 inches, 18 consecutive minutes of Method 9 observations result in an 18-minute average opacity that is greater than 15 percent and not more than 20 percent, unless the Department has waived this requirement in writing</p> <p>28.3 During each one-hour PM source test run, observe the exhaust for 18 minutes in accordance with Method 9 and calculate the average opacity that was measured during each one-hour test run. Submit a copy of these observations with the source test report.</p> <p>28.4 The automatic PM source test requirement in conditions 28.1 and 28.2 is waived for an emissions unit if a PM source test on that unit has shown compliance with the PM standard during this permit term.</p>	Continuous	HSE Document Review
29	Particulate Matter Recordkeeping for Liquid Fuel-Fired Engines. Within 180 calendar days of the effective date of this permit, the Permittee shall record the exhaust stack diameter(s) of Source ID(s) 18 through 24. Report the stack diameter(s) in the next facility operating report under condition 65.	Continuous	HSE Document Review
30, 30.1, 30.2	<p>Particulate Matter Reporting for Liquid Fuel-Fired Engines. The Permittee shall report as follows:</p> <p>30.1 report under condition 63</p> <p>a. the results of any PM source test that exceed the PM emissions limit; or</p> <p>b. if one of the criteria of condition 28.2 was exceeded and the Permittee did not comply with either condition 28.1a or 28.1b</p> <p>30.2 report observations in excess of the threshold of condition 28.2b within 30 days of the end of the month in which the observations occur;</p>	Continuous	HSE Document Review Field Operating/Maintenance Records Review
30.3	<p>In each facility operating report under condition 65, include</p> <p>a. the dates, Source ID(s), and results when an observed 18-minute average was greater than an applicable threshold in condition 28.2;</p> <p>b. a summary of the results of any PM testing under condition 28; and</p> <p>c. copies of any visible emissions observation results (opacity observations) greater than the thresholds of condition 28.2, if they were not already submitted.</p>	Continuous	HSE Document Review Field Operating/Maintenance Records Review
31, 31.1, 31.2, 31.3	<p>Visible Emissions Monitoring, Recordkeeping, and Reporting. The Permittee shall observe the first six daylight flare events occurring during the life of this permit.</p> <p>31.1 Monitor flare events using Method-9 for 18 minutes to obtain 72 individual 15-second readings.</p> <p>31.2 Record the following information for observed events:</p> <p>a. the flare(s) Source ID number;</p> <p>b. results of the Method-9 observations;</p> <p>c. reason(s) for flaring;</p> <p>d. date, beginning and ending time of event; and</p> <p>e. cumulative volume of gas flared.</p> <p>31.3 Monitoring of a flare event may be postponed for safety or weather reasons, or because a qualified observer is not available. Until monitoring has been completed on the six flare events described in this condition, the Permittee shall either monitor each qualifying flare event or include in the next facility operating report required by condition 65 an explanation of the reason the event was not monitored.</p>	Continuous	HSE Document Review Field Operating/Maintenance Records Review
31.4, 31.5	<p>31.4 Attach copies of the records required by condition 31.2 with the facility operating report required by condition 65.</p> <p>31.5 Report under condition 63 whenever the opacity standard in condition 3 is exceeded.</p>	Continuous	HSE Document Review Field Operating/Maintenance Records Review
Section 7. Facility-Wide Requirements			
32	Significant New Alternatives Policy Programs. The Permittee shall comply with the prohibitions set out in 40 CFR 82.174(b) through (d) (Protection of Stratospheric Ozone Subpart G – Significant New Alternatives Policy Program) pertaining to substitute products for ozone-depleting compounds. Monitoring shall consist of an annual certification that the Permittee complies with these prohibitions.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review

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33	Halon Emissions Reduction. The Permittee shall comply with the prohibitions set out in 40 CFR 82.270(b) through (f) (Protection of Stratospheric Ozone Subpart H – Halon Emissions Reduction). Monitoring shall consist of an annual certification that the Permittee complies with these prohibitions.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
Section 8. Insignificant Sources			
34, 34.1, 34.2	For sources at the facility that are insignificant as defined in 18 AAC 50.335(q)-(v) that are not listed in this permit, the following apply: 34.1 The Permittee shall submit the compliance certifications of condition 66 based on reasonable inquiry; 34.2 The Permittee shall comply with the requirements of condition 46;	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review Advisory Provision
34.3	The Permittee shall report in the facility operating report required by condition 65 if a source is insignificant because of historical actual emissions less than the thresholds of 18 AAC 50.335(r), and current actual emissions become greater than any of those thresholds.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review Advisory Provision
34.4	No other monitoring, recordkeeping or reporting is required.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
35	The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from an industrial process, fuel-burning equipment, or an incinerator to reduce visibility through the exhaust effluent by either more than 20% for more than three minutes in any one hour, or more than 20% averaged over any six consecutive minutes.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
36	The Permittee shall not cause or allow particulate matter emitted from an industrial process or fuel-burning equipment to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
37	The Permittee shall not cause or allow sulfur compound emissions, expressed as SO ₂ , from an industrial process or fuel-burning equipment, to exceed 500 ppm averaged over three hours.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
Section 9. Generally Applicable Requirements			
38	NESHAPs Subpart A, Applicability Determination. The Permittee shall determine rule applicability and designation of affected sources under National Emission Standards for Hazardous Air Pollutants (NESHAPs) for Source Categories (40 CFR 63) in accordance with the procedures described in 40 CFR 63.1(b). 38.1 NESHAPs Subpart A, Recordkeeping. The Permittee shall maintain records in accordance with §63.10(b)(3).	Continuous	HSE Document Review

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39	Asbestos NESHAP. The Permittee shall comply with the requirements set forth in 40 C.F.R. 61.145 and 61.150 of Subpart M, and the applicable sections set forth in 40 C.F.R. 61, Subpart A and Appendix A.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
40	Refrigerant Recycling and Disposal. The Permittee shall comply with the applicable standards for recycling and emission reduction of refrigerants set forth in 40 C.F.R. 82, Subpart F. Applicable requirements include 40 CFR 82.154, 82.156, 82.161, 82.162, and 82.166.	Continuous	Operating Practices Review
41	Good Air Pollution Control Practice. The Permittee shall do the following for Source ID(s) 9 through 23, and 27 through 32: a. Perform regular maintenance considering the manufacturer's or the operator's maintenance procedures; b. Keep records of any maintenance that would have a significant effect on emissions; the records may be kept in electronic format; c. Keep a copy of either the manufacturer's or the operator's maintenance procedures.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
42	Dilution. The Permittee shall not dilute emissions with air to comply with this permit. Monitoring shall consist of an annual certification that the Permittee does not dilute emissions to comply with this permit.	Continuous	HSE Document Review Field Operating/Maintenance Records Review Operating Practices Review
43	Reasonable Precautions to Prevent Fugitive Dust. The Permittee shall take reasonable precautions to prevent particulate matter from being emitted into the ambient air when causing or permitting bulk materials to be handled, transported, or stored, or when engaging in an industrial activity or construction project. Monitoring shall consist of an annual certification that reasonable precautions were taken.	Continuous	HSE Document Review Pad Speed Limits Roads and Pads Maintenance Practices
44	Stack Injection. The Permittee shall not release materials other than process emissions, products of combustion, or materials introduced to control pollutant emissions from a stack at a source constructed or modified after November 1, 1982, unless approved in writing by the Department. Monitoring shall consist of an annual certification that the Permittee does not conduct stack injection at the facility.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
45	Open Burning. The Permittee shall conduct any open burning at the facility in accordance with the requirements of 18 AAC 50.065. Monitoring shall consist of an annual certification that any open burning complied with 18 AAC 50.065.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
46, 46.1	Air Pollution Prohibited. No person may permit any emission which is injurious to human health or welfare, animal or plant life, or property, or which would unreasonably interfere with the enjoyment of life or property. 46.1 If emissions present a potential threat to human health or safety, the Permittee shall report any such emissions according to condition 63.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
46.2, 46.3	46.2 As soon as practicable after becoming aware of a complaint that is attributable to emissions from the facility, the Permittee shall investigate the complaint to identify emissions that the Permittee believes have caused or are causing a violation of condition 46. 46.3 The Permittee shall initiate and complete corrective action necessary to eliminate any violation identified by a complaint or investigation as soon as practicable if a. after an investigation because of a complaint or other reason, the Permittee believes that emissions from the facility have caused or are causing a violation of condition 46; or b. the Department notifies the Permittee that it has found a violation of condition 46.	Continuous	HSE Document Review
46.4	The Permittee shall keep records of a. the date, time, and nature of all emissions complaints received; b. the name of the person or persons that complained, if known; c. a summary of any investigation, including reasons the Permittee does or does not believe the emissions have caused a violation of condition 46; and d. any corrective actions taken or planned for complaints attributable to emissions from the facility.	Continuous	HSE Document Review

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46.5	With each facility operating report required under condition 65, the Permittee shall include a brief summary report which must include a. the number of complaints received; b. the number of times the Permittee or the Department found corrective action necessary; c. the number of times action was taken on a complaint within 24 hours; and d. the status of corrective actions the Permittee or Department found necessary that were not taken within 24 hours.	Continuous	HSE Document Review
46.6	The Permittee shall notify the Department of a complaint that is attributable to emissions from the facility within 24 hours after receiving the complaint, unless the Permittee has initiated corrective action within 24 hours of receiving the complaint.	Continuous	HSE Document Review
47	Technology-Based Emission Standard. If an unavoidable emergency, malfunction, or non-routine repair, as defined in 18 AAC 50.235, causes emissions in excess of a technology-based emission standard, the Permittee shall take all reasonable steps to minimize levels of emissions that exceed the standard. Excess emissions reporting under condition 63 requires information on the steps taken to minimize emissions. The report required under condition 63 is adequate monitoring for compliance under this condition.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
48	Permit Renewal. To renew this permit, the Permittee shall submit an application under 18 AAC 50.335 no sooner than May 26, 2007 and no later than May 26, 2008.	Continuous	HSE Document Review Title V permit renewal application was submitted on 5/22/2008.
Section 10. General Source Testing and Monitoring Requirements			
49	Requested Source Tests. In addition to any source testing explicitly required by the permit, the Permittee shall conduct source testing as requested by the Department to determine compliance with applicable permit requirements.	Continuous	HSE Document Review
50	Operating Conditions. Unless otherwise specified by an applicable requirement or test method, the Permittee shall conduct source testing 50.1 at a point or points that characterize the actual discharge into the ambient air; and 50.2 at the maximum rated burning or operating capacity of the source or another rate determined by the Department to characterize the actual discharge into the ambient air.	Continuous	HSE Document Review
51, 51.1, 51.2, 51.3	Reference Test Methods. The Permittee shall use the following as reference test methods when conducting source testing for compliance with this permit: 51.1 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(a) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60. 51.2 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(b) must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 61. 51.3 Source testing for compliance with requirements adopted by reference in 18 AAC 50.040(c) must be conducted in accordance with the source test methods and procedures specified in 40 C.F.R. 63.	Continuous	HSE Document Review
51.4, 51.5	51.4 Source testing for reduction in visibility through the exhaust effluent must be conducted in accordance with the procedures set out in Reference Method 9. 51.5 Source testing for emissions of total particulate matter, sulfur compounds, nitrogen compounds, carbon monoxide, lead, volatile organic compounds, fluorides, sulfuric acid mist, municipal waste combustor organics, metals, and acid gases must be conducted in accordance with the methods and procedures specified in 40 C.F.R. 60, Appendix A.	Continuous	HSE Document Review
51.6, 51.7	51.6 Source testing for emissions of PM-10 must be conducted in accordance with the procedures specified in 40 C.F.R. 51, Appendix M, Method 201. 51.7 Source testing for emissions of any contaminant may be determined using an alternative method approved by the Department in accordance with 40 C.F.R. 63 Appendix A, Method 301.	Continuous	HSE Document Review

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52	Excess Air Requirements. To determine compliance with this permit, standard exhaust gas volumes must include only the volume of gases formed from the theoretical combustion of the fuel, plus the excess air volume normal for the specific source type, corrected to standard conditions (dry gas at 68° F and an absolute pressure of 760 millimeters of mercury).	Continuous	HSE Document Review
53	Test Exemption. The Permittee is not required to comply with conditions 55, 56 and 57 when the exhaust is observed for visible emissions.	Continuous	Advisory Provision
54	Test Deadline Extension. The Permittee may request an extension to a source test deadline established by the Department. The Permittee may delay a source test beyond the original deadline only if the extension is approved in writing by the Department's appropriate division director or designee.	Continuous	HSE Document Review
55	Test Plans. Except as provided in condition 53, before conducting any source tests, the Permittee shall submit a plan to the Department. The plan must include the methods and procedures to be used for sampling, testing, and quality assurance and must specify how the source will operate during the test and how the Permittee will document that operation. The Permittee shall submit a complete plan within 60 days after receiving a request under condition 49 and at least 30 days before the scheduled date of any test unless the Department agrees in writing to some other time period. Retesting may be done without resubmitting the plan.	Continuous	HSE Document Review
56	Test Notification. Except as provided in condition 53, at least 10 days before conducting a source test, the Permittee shall give the Department written notice of the date and the time the source test will begin.	Continuous	HSE Document Review
57	Test Reports. Except as provided in condition 53, within 60 days after completing a source test, the Permittee shall submit two copies of the results in the format set out in the Source Test Report Outline, adopted by reference in 18 AAC 50.030. The Permittee shall certify the results in the manner set out in condition 59. If requested in writing by the Department, the Permittee must provide preliminary results in a shorter period of time specified by the Department.	Continuous	HSE Document Review
58	Particulate Matter Calculations. In source testing for compliance with the particulate matter standards in conditions 4 and 36, the three-hour average is determined using the average of three one-hour test runs.	Continuous	HSE Document Review

Section 11. General Recordkeeping, Reporting, and Compliance Certification Requirements

59	Certification. The Permittee shall certify all reports, compliance certifications, or other documents submitted to the Department and required under the permit by including the signature of a responsible official for the permitted facility following the statement: "Based on information and belief formed after reasonable inquiry, I certify that the statements and information in and attached to this document are true, accurate, and complete." Excess emission reports must be certified either upon submittal or with an operating report required for the same reporting period. All other reports and other documents must be certified upon submittal. When certifying a compliance certification, the official's signature must be notated.	Continuous	HSE Document Review
60	Submittals. Unless otherwise directed by the Department or this permit, the Permittee shall send reports, compliance certifications, and other documents required by this permit to ADEC, Air Permits Program, 610 University Ave., Fairbanks, AK 99709-3643, ATTN: Compliance Technician.	Continuous	HSE Document Review

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61	<p>Information Requests. The Permittee shall furnish to the Department, within a reasonable time, any information the Department requests in writing to determine whether cause exists to modify, revoke and reissue, or terminate the permit or to determine compliance with the permit. Upon request, the Permittee shall furnish to the Department copies of records required to be kept by the permit. The Department may require the Permittee to furnish copies of those records directly to the federal administrator.</p>	Continuous	HSE Document Review
62	<p>Recordkeeping Requirements. The Permittee shall keep all records required by this permit for at least five years after the date of collection, including:</p> <p>62.1 copies of all reports and certifications submitted pursuant to this section of the permit; and</p> <p>62.2 records of all monitoring required by this permit, and information about the monitoring including:</p> <ul style="list-style-type: none"> a. calibration and maintenance records, original strip chart or computer-based recordings for continuous monitoring instrumentation; b. sampling dates and times of sampling or measurements; c. the operating conditions that existed at the time of sampling or measurement; d. the date analyses were performed; e. the location where samples were taken; f. the company or entity that performed the sampling and analyses; g. the analytical techniques or methods used in the analyses; and h. the results of the analyses. 	Continuous	HSE Document Review
63, 63.1	<p>Excess Emissions and Permit Deviation Reports.</p> <p>63.1 Except as provided in condition 46, the Permittee shall report all emissions or operations that exceed or deviate from the requirements of this permit as follows:</p> <ul style="list-style-type: none"> a. in accordance with 18 AAC 50.240(c), as soon as possible after the event commenced or is discovered, report <ul style="list-style-type: none"> (i) emissions that present a potential threat to human health or safety; and (ii) excess emissions that the Permittee believes to be unavoidable; b. in accordance with 18 AAC 50.235(a), within two working days after the event commenced or was discovered, report an unavoidable emergency, malfunction, or nonroutine repair that causes emissions in excess of a technology based emission standard, c. report all other excess emissions and permit deviations <ul style="list-style-type: none"> (i) within 30 days of the end of the month in which the emissions or deviation occurs or is discovered, except as provided in conditions 63.1c(ii) and 63.1c(iii); (ii) if a continuous or recurring excess emissions is not corrected within 48 hours of discovery, within 72 hours of discovery unless the Department provides written permission to report under condition 63.1c(i); and (iii) for failure to monitor, as required in other applicable conditions of this permit. 	Continuous	HSE Document Review
63.2, 63.3, 63.4	<p>63.2 When reporting excess emissions, the Permittee must report using either the Department's on-line form, which can be found at www.state.ak.us/dec/dawq/aqm/eeform.pdf, or, if the Permittee prefers, the form contained in Section 17 of this permit. The Permittee must provide all information called for by the form.</p> <p>63.3 When reporting a permit deviation, the Permittee must report using either the Department's on-line form, which can be found at www.state.ak.us/dec/dawq/aqm/eeform.pdf, or, if the Permittee prefers, the form contained in Section 17 of this permit. The Permittee must provide all information called for by the form.</p> <p>63.4 If requested by the Department, the Permittee shall provide a more detailed written report as requested to follow up an excess emissions report.</p>	Continuous	HSE Document Review
64, 64.1	<p>NSPS and NESHAP Reports. The Permittee shall:</p> <p>64.1 attach to the facility operating report required by condition 65, copies of any NSPS and NESHAPs reports submitted to the U.S. Environmental Protection Agency (EPA) Region 10, unless copies have already been provided to the Department at the time submitted to EPA, and</p>	Continuous	HSE Document Review
64.2	<p>Upon request by the Department provide a copy of any EPA-granted waiver of the federal emission standards, record keeping, monitoring, performance testing, or reporting requirements, or approved custom monitoring schedules.</p>	Continuous	HSE Document Review

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183TVP01, Revision 3
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Determination Method
65, 65.1	<p>Operating Reports. During the life of this permit, the Permittee shall submit to the Department an original and two copies of an operating report by April 30 for the period January 1 to March 31, by July 30 for the period April 1 to June 30, by October 30 for the period July 1 to September 30, and by February 14 for the period October 1 to December 31 of the previous year.</p> <p>65.1 The operating report must include all information required to be in operating reports by other conditions of this permit.</p>	Continuous	HSE Document Review
65.2	<p>If excess emissions or permit deviations that occurred during the reporting period are not reported under condition 65.1, either</p> <p>a. The Permittee shall identify</p> <p>(i) the date of the deviation;</p> <p>(ii) the equipment involved;</p> <p>(iii) the permit condition affected;</p> <p>(iv) a description of the excess emissions or permit deviation; and</p> <p>(v) any corrective action or preventive measures taken and the date of such actions; or</p> <p>b. When excess emissions or permit deviations have already been reported under condition 63, the Permittee may cite the date or dates of those reports.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
65.3	<p>The operating report must include a listing of emissions monitored under conditions 21.2b and 23 which trigger additional testing or monitoring, whether or not the emissions monitored exceed an emission standard. The Permittee shall include in the report</p> <p>a. the date that additional monitoring or testing was triggered;</p> <p>b. the equipment involved;</p> <p>c. the permit condition affected; and</p> <p>d. the monitoring result which triggered the additional monitoring.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
66	<p>Annual Compliance Certification. Each year by March 31, and for reporting periods following the effective date of this permit the Permittee shall compile and submit to the Department an original and two copies of an annual compliance certification report as follows:</p> <p>66.1 For each permit term and condition set forth in Section 4 through Section 11, including terms and conditions for monitoring, reporting, and recordkeeping:</p> <p>a. certify the compliance status over the preceding calendar year consistent with the monitoring required by this permit;</p> <p>b. state whether compliance is intermittent or continuous;</p> <p>c. briefly describe each method used to determine the compliance status; and</p> <p>d. notarize the responsible official's signature.</p> <p>66.2 In addition, submit a copy of the report directly to the EPA-Region 10, Office of Air Quality, M/S OAQ-107, 1200 Sixth Avenue, Seattle, WA 98101.</p>	Continuous	<p>2018 Annual Compliance</p> <p>2017 Annual Compliance Certification was submitted on March 29, 2018.</p>

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183MSS03, Revision 1
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Method Used
Section 2. Emission Fees			
2.1	the facility's assessable potential to emit of 2,892 TPY;	Continuous	Accounting Records Review
Section 3. State Emission Standards			
4	Visible Emissions: The Permittee shall not cause or allow visible emissions, excluding condensed water vapor, emitted from EUs 1, 2, 4 through 24, 27 through 32, 36, and 37 listed in Table 1 to reduce visibility through the exhaust effluent by more than 20% averaged over any six consecutive minutes.	Intermittent	HSE Document Review Field Operating/Maintenance Records Review One excess emission was submitted on 3/18/2018 for black smoke at EU ID 27 on 3/16/2018. One excess emission was submitted on 4/15/2018 for black smoke on EU ID 32 on 4/11/2018. One excess emission was submitted on 7/22/2018 for black smoke on EU IDs 27 and 28 on 7/20/2018. One excess emission was submitted on 8/15/2018 for black smoke on EU ID 32 on 8/11/2018.
4.1	Monitor record and report as described in the operating permit issued for the source under AS 46.14.130(b) and 18 AAC 50.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
5	Particulate Matter: The Permittee shall not cause or allow particulate matter emitted from EUs 1, 2, 4 through 24, 27 through 32, 36, and 37 listed in Table 1 to exceed 0.05 grains per cubic foot of exhaust gas corrected to standard conditions and averaged over three hours. 5.1 Monitor record and report as described in the operating permit issued for the source under AS 46.14.130(b) and 18 AAC 50.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
6	Sulfur Compound Emissions. The Permittee shall not cause or allow sulfur compound emissions, expressed as sulfur dioxide (SO ₂), from EUs 1, 2, 4 through 24, 27 through 32, 36, and 37 listed in Table 1 to exceed 500 parts per million (ppm) averaged over three hours. 6.1 Monitor record and report as described in the operating permit issued for the source under AS 46.14.130(b) and 18 AAC 50.	Continuous	HSE Document Review Field Operating/Maintenance Records Review
Section 4. Ambient Air Quality Protection Requirements			
7.1	Liquid Fuel Sulfur Content: The sulfur content of liquid fuel burned in EUs 9 through 15 and EUs 18 through 24 listed in Table 1 shall not exceed 0.11 percent by weight (wt%) at any time. a. Monitor and record the sulfur content of the liquid fuel delivered to the stationary source as described in the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50. b. Report in the operating report described in the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50 the sulfur content of the liquid fuel recorded under Condition 7.1a. c. Report as permit deviations as described in the operating permit issued to the source under AS 46.14.130(b) and 18 AAC 50 if the sulfur content of the liquid fuel recorded under Condition 7.1a exceeds 0.11 wt% at any time.	Continuous	HSE Document Review

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183MSS03, Revision 1
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Method Used
7.2a, 7.2b	<p>a. The H₂S content of the fuel gas burned in EUs 1, 2, 4, 6 through 8, EUs 9 through 15, EUs 16 and 17, and flares EU 27 through 32 listed in Table 1, shall not exceed at any time:</p> <p>(i) 125 parts per million by volume (ppmv) when the sulfur content of the liquid fuel burned by any of EUs 9 through 15 or 18 through 24 is greater than 15 parts per million by weight (ppmw); and</p> <p>(ii) 185 ppmv when the sulfur content of the liquid fuel burned by all of EUs 9 through 15 and 18 through 24 is 15 ppmw or less.</p> <p>b. The H₂S content of the fuel gas burned in EUs 5 and 36 listed in Table 1 shall not exceed 200 ppmv at any time.</p>	Continuous	HSE Document Review
9	<p>Turbine H₂S/SO₂ BACT Emission Limits: The Permittee shall limit emissions from EU 5 as indicated in Table 2.</p> <p>9.1 Monitor, record, and report as described in the operating permit issued to the stationary source under AS 46.14.130(b) and 18 AAC 50 to demonstrate compliance with the turbine BACT limits in Table 2.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>

Gathering Center 2
2018 Title V Compliance Certification
Air Quality Permit No. AQ0183MSS03, Revision 1
Reporting Period: January 1, 2018 to December 31, 2018

Condition	Permit	Status (Intermittent or Continuous)	Compliance Method Used
Section 6. MR&R for SO₂ Emissions from Fuel Gas Combustion			
10, 10.1	<p>Monitoring: Beginning in 2013 and ending in 2022, the Permittee shall monitor emissions from EUs 1, 2, 4 through 17, 27 through 32, and 36 listed in Table 1, and beginning in 2014 and ending in 2023, the Permittee shall calculate calendar year SO₂ emissions from the EUs as follows:</p> <p>10.1 Monitor and record the amount of fuel gas burned in million standard cubic feet (MMscf) during each calendar month of the calendar year using the fuel gas meter calibrated to manufacturer's specifications.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p> <p>Operating Practices Review</p>
10.2	<p>Calculate the total SO₂ emissions for each calendar month of the calendar year using the amount of fuel gas recorded in Condition 10.1, H₂S content of the fuel gas measured in Condition 7.2c, and the equation given below:</p> $\text{Tons SO}_2 = [(\text{MMscf}) \times (\text{ppmv H}_2\text{S}) / (379.6 \text{ scf per mole})] \times (64 \text{ lb SO}_2 \text{ per mole H}_2\text{S}) / 2000$	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
10.3, 10.4	<p>10.3 By February 15th of each calendar year, calculate the total SO₂ emissions for the preceding calendar year by summing the emissions calculated in Condition 10.2 for the 12 months in the preceding calendar year.</p> <p>10.4 By February 15th of each calendar year, determine the net change in SO₂ emissions in tpy for the preceding calendar year as follows:</p> $\text{Net Change in Emissions} = (\text{Emissions calculated in Condition 10.3}) - 14.0 \text{ tpy}$	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p> <p>Operating Practices Review</p>
11	<p>Recordkeeping: The Permittee shall maintain the following records for EUs 1, 2, 4 through 17, 27 through 32, and 36 and make them available to Department personnel on request:</p> <p>11.1 The fuel gas consumed (in MMscf) for each calendar month of the calendar year;</p> <p>11.2 The average fuel gas H₂S concentration (in ppmv) data for each calendar month of the calendar year;</p> <p>11.3 The actual total SO₂ emissions for each calendar month of the year estimated under Condition 10.2 and supporting calculations used to obtain the emission estimates;</p> <p>11.4 The actual total SO₂ emissions for each calendar year estimated under Condition 10.3 and supporting calculations used to obtain the emission estimates; and</p> <p>11.5 The net change in SO₂ emissions for each calendar year determined under Condition 10.4.</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
12, 12.1	<p>Reporting: For EUs 1, 2, 4 through 17, 27 through 32, and 36 in Table 1, the Permittee shall report as follows:</p> <p>12.1 For calendar years 2013 through 2022, report in the operating report required in the operating permit issued for the stationary source under AS 46.14.130(b) and 18 AAC 50 the following information</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
12.1a	SO ₂ emissions for each calendar month of the year calculated in Condition 10.2; and	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
12.1b	in the final operating report for the calendar year, report the net change in SO ₂ emissions calculated in Condition 10.4 for the calendar year ending with the last month of the reporting period.	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
12.2	<p>By March 1st of each calendar year in years 2014 through 2023, report the following information to the Department if the net change in SO₂ emissions calculated under Condition 10.4 for the preceding year reaches or exceeds 40 tpy.</p> <p>a. The annual emissions calculated in Condition 10.3 and the net change in emissions calculated in Condition 10.4; and</p> <p>b. Any other information that the Permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).</p>	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>
12.3	Report as a permit deviation in the report required in the operating permit issued for the source under AS 46.14.130(b) and 18 AAC 50 if monitoring, recordkeeping, or reporting under Conditions 10, 11, or 12 is not completed as required.	Continuous	<p>HSE Document Review</p> <p>Field Operating/Maintenance Records Review</p>